

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER PARTNERS II LLC,  
*Plaintiff and Counterclaim-Defendant,*

v.

T-MOBILE USA, INC. AND SPRINT LLC,  
*Defendants and Counterclaimant-Plaintiffs.*

HEADWATER PARTNERS II LLC,  
*Plaintiff and Counterclaim-Defendant,*

v.

AT&T SERVICES, INC., AT&T MOBILITY,  
LLC AND AT&T CORP.,  
*Defendants and Counterclaimant-Plaintiffs.*

Case No. 2:24-cv-00015-JRG-RSP  
(LEAD CASE)

**JURY TRIAL DEMANDED**

Case No. 2:24-cv-00016-JRG-RSP  
(MEMBER CASE)

**JURY TRIAL DEMANDED**

**JOINT MOTION FOR ENTRY OF AGREED  
PROTECTIVE ORDER**

Plaintiff Headwater Partners II LLC (“Headwater”) and Defendants T-Mobile USA, Inc. and Sprint LLC (collectively, “T-Mobile”) and AT&T Services, Inc., AT&T Mobility, LLC and AT&T Corp. (collectively, “AT&T”) (all together, the “Parties”), hereby jointly request that the Court enter the proposed Protective Order, attached hereto as Exhibit A.

Dated: April 25, 2024

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**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this April 25, 2024, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Marc Fenster  
Marc Fenster

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). The parties are in agreement on filing this Joint Motion.

/s/ Marc Fenster  
Marc Fenster